

Firestone

June 19, 1987

Ms. Ruth Mancos
Document Control Officer
United States Environmental
Protection Agency (5HE-12)
230 South Dearborn Street
Chicago, Illinois 60604

Re: Sanitary Landfill Company (Industrial
Waste Disposal Co., Inc.) Site on
Cardington Road in Montgomery County, Ohio

Dear Ms. Mancos:

This letter is a supplement to our May 26, 1987 response to the request for information relating to the above-referenced site (the "Cardington Road Site") sent by Basil G. Constantelos to The Firestone Tire & Rubber Company ("Firestone") on April 20, 1987.

Firestone hereby incorporates by reference the objections and qualifications raised in its previous response, as well as the request for confidential treatment made therein. The same request for confidential treatment is hereby made for this letter and all information contained herein or transmitted herewith.

Supplement to Specific Responses

2. A memorandum dated January 13, 1978 is attached, together with a "1977 Waste Management Survey" which indicates that Industrial Waste Disposal Co., Inc. was one of three contract haulers used by the Dayton tire plant during that year. The survey also indicates that certain quantities of oil and general waste materials were "Hauled by Contractor." However, Firestone cannot verify whether any of these quantities were sent to the Cardington Road Site.
5. Copies of three memoranda, dated February 20, June 24, and July 9, 1976, are attached. These memoranda indicate that after 1976 the tires and wood pallets discarded by the Dayton tire plant were shredded for disposal.


Conclusion

The information provided in this supplemental response, together with that contained in Firestone's original response of May 26, is all that has been found after a search of the relevant stored records from the Dayton tire plant. With this supplemental response, therefore,

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I believe that Firestone has fulfilled its commitment to provide any additional documents and has completely satisfied its obligations in responding to U.S. EPA's request for information relating to the Cardington Road Site. I will assume that the Agency concurs unless we are advised in writing to the contrary within ten days of the date of this letter.

Sincerely,

A handwritten signature in cursive script, reading "Stephen V. Moser".

Stephen V. Moser
Senior Counsel

SVM:pc
Enc.

cc: Mr. E. H. Hurst
Mr. G. K. Barnes

Dayton

INTEROFFICE

RECEIVED

JAN 16 1978

TO

J. R. LAMAN
ENVIRONMENTAL ENGINEERING
AKRON

DATE JANUARY 13, 1978

FROM F. P. GEBHART

SUBJECT

1977 INDUSTRIAL WASTE
MANAGEMENT SURVEY

REFERENCE

Please find attached a copy of the completed "1977 Industrial Waste Management Survey" as received from Battelle Columbus Laboratories.

We are expecting a visit from Ms. Shirley Smith on January 20, 1978, for the release of this information.

If you have any questions or directions concerning this information and/or its release to Ms. Smith, please contact the writer or Mr. J. F. Thornton.


Frank P. Gebhart
Plant Engineering

FPG/lgl

Attachment

cc: R. M. Walter/ETR Corp. Law/Attachment

T. W. Hollister/DTR/Attachment

J. F. Thornton/DTR

will be for release - see table II enclosed

Ohio 1977 Industrial Waste Management Survey

I. General Information

1. Company Name: Dayton Tire & Rubber Company
2. Mailing Address: 2342 W. Riverview Ave., Dayton, Ohio 45407
Street City Zip Code
3. Plant Location: 2342 W. Riverview Ave., Dayton, Ohio 45407
Street City County Zip Code
4. Person Responsible for Plant Operations: Harold E. Powell
Name
Plant Manager 278-2666 X-217
Title Phone
5. Person Providing Information: Frank P. Miracle
Name
Manager, Waste Control 278-2666 X-359
Title Phone
6. Principal Products and Their Standard Industrial Classification Codes (SIC):
- | Products | SIC | Amount or % of Total Production |
|-----------------------------------|-------------|---------------------------------|
| a. <u>Pass. & Truck Tires</u> | <u>3011</u> | <u>100</u> |
| b. _____ | _____ | _____ |
| c. _____ | _____ | _____ |
| d. _____ | _____ | _____ |
7. Processes Used at Plant:
- | Product | Processes |
|-----------------------------------|---|
| a. <u>Pass. & Truck Tires</u> | <u>Vulcanization by steam and hot water</u> |
| b. _____ | _____ |
| c. _____ | _____ |
| d. _____ | _____ |

8. Raw Materials and Other Chemicals Used in Manufacturing Processes:

- a. Natural rubber e. Petroleum oil and waxes
 b. Synthetic Polymers f. Rubber chemicals
 c. Synthetic Fabrics g. Carbon black
 d. Steel Wire h. Solvents

II. Treatment Facilities

1. On-Site Wastewater Treatment Facilities: Yes _____ No
- X

a. NPDES No.: _____

- b. On-Site Wastewater Treatment Facilities by 1983: Yes _____ No
- X

2. Industrial Municipal Discharge: Yes
- X
- No _____

a. Name of Plant: City of Daytonb. Pretreatment: Yes _____ No Xc. Industrial Municipal Discharge by 1983: Yes X No _____

3. Air Pollution Control Facilities: Yes
- X
- No _____

a. Types: Cyclone collectors, Bag Houses, filters, boiler combustion controlsb. Air Permit Nos.: *See Belowc. Air Pollution Control Facilities by 1983: Yes X No _____

4. In-House Waste Treatment Capabilities:
- None

*Air permit numbers:

0857040041 P001	0857040041 P008	0857040041 R001
0857040041 P002	0857040041 P009	0857040041 R002
0857040041 P003	0857040041 P010	0857040041 T001
0857040041 P004	0857040041 P011	0857040041 T002
0857040041 P005	0857040041 P012	0857040041 B001
0857040041 P006	0857040041 P013	0857040041 B002
0857040041 P007		0857040041 B003

5. Is there any currently used or abandoned landfill, dump, or lagoon on plant property?: Yes _____ No X

	Currently Used	Abandoned
a. Landfill	_____	_____
b. Dump	_____	_____
c. Lagoon	_____	_____

6. Attach sketch of treatment facilities including storage areas. (For site inspections only).

III. Storage Area Practices

1. Area Diked: Yes _____ No X
2. Drainage Collection System: Yes X No _____

IV. Off-Site Disposal

1. Waste hauled off site by: You _____ Others X
2. Contract hauler utilized:

Name	Address
a. Industrial Waste Disposal Co., Inc.	P.O. Box 1453 3975 Wagner Ford Rd. Dayton, Ohio 45414
b. I.W.D. Liquid Waste Inc.	(Same)
c. Geo. Wiley Sanitary Svc.	7250 E. New Carlisle Rd., New Carlisle, Ohio 45314

3. Private Contractors and/or Municipal Landfills Utilized:

Name	Address
a. Industrial Waste Disposal Co., Inc.	P.O. Box 1453 3975 Wagner Ford Rd. Dayton, Ohio 45414
b. _____	_____
c. _____	_____

4. Approximately how many miles must your industrial waste in Tables I and II for its disposal or recycling: 40 miles (please round to nearest mile).

V. Costs

1. Total internal expenditures for industrial waste management function (include and operation costs for processing, storage, collection and disposal ex. capital) to include Salvage cost

\$ 622,050.00 /Year

2. Total annual return from internal salvage: \$ None /Year

3. Total annual charges by external industrial waste handlers: (total dollars/year) (a) Contract haulers: \$ 124,858.00 (b) Private landfill operators: \$ (c) Municipal ~~refuse~~ discharge ~~disposal~~ \$

4. Total annual return from external salvage: \$ None /Year

5. If your company utilizes outside contractors, do you feel that your total costs for handling and processing your industrial wastes are:

(a) Reasonable

(b) Moderately expensive

(c) Excessive X

VI. Industrial Waste Exchange Program and Waste Treatment Centers

1. Do you feel your company would use the services provided by an industrial waste exchange program? Yes No X
2. Do you feel that there is a need for regional energy recovery, recycling, and industrial waste treatment centers?: Yes No X

Waste Type	Physical State			Frequency of Waste Production				On-Site Treatment Methods					
	Liquid	Solid	Sludge	Seasonal	Continual	Occasional	Other (Specify)	Neutralization	Chemical Precipitation	Recipitation by Evaporation	Oxidation or Reduction	Recycling or Waste Recovery	Biological Oxidation
01. Pesticides													
02. Acids													
03. Caustics													
04. Pickle liquors													
05. Metals*													
06. Mercury compounds													
07. Cyanides													
08. Phosphorous compounds													
09. Halogenated hydrocarbons													
10. Non-halogenated hydrocarbons													
11. Solvents													
12. Oils	X				X							X	
13. Plastics													
14. Resins													
15. Paints													
16. Explosives													
17. Radioactive materials													
18. Pathogenic materials													
19. Fluorides													
20. Other inorganic materials													
21. General		X			X							X	

* Chromium, manganese, nickel, zinc, arsenic, selenium, silver, cadmium, antimony, gold, platinum, and lead compounds.

JULY 9, 1976

MEMORANDUM

DAYTON MOR #158-0389
TIRE SHREDDER MACHINE
File #158-400

PURPOSE: Purchase and install one (1) Saturn Model 52-32H/100 HP
Tire Shredder.

COST: \$63,720

DAILY
SAVINGS: \$159.10

ANNUAL
PERCENT
RETURN: 30.4%

- REMARKS:
1. Recommend approval.
 2. Installation of the subject equipment will reduce the volume of tires and pallets going to the landfill and/or incinerator by approximately 75 percent. The dumpster units required will be decreased from 5 to 2 units, thereby decreasing monthly rental and a corresponding number of trips to the landfill.
 3. Dayton advises that the subject equipment will be attended by current personnel.
 4. Attached is a brochure describing the shredder unit. Due to the different types of material being shredded, --tires, pallets, boxes, cardboard, etc.--the capacity in pounds per hour is not known at the present time. However, the volume reduction is estimated at 1 to 5. Dayton advises the one proposed unit will be adequate for their requirements.

TIRE DIVISION
INDUSTRIAL ENGINEERING

CFB:pb
attachment
cc: Mr. E. H. Strobel
Mr. J. B. Rice

June 24, 1976

APPROPRIATION REQUEST

Dayton

\$63,720

Funds required to purchase and install one Saturn Tire Shredder which will shred tires and wood pallets. Once these items are shredded, the space required in the disposal units is substantially reduced, thus resulting in a reduction in our plants Waste Disposal costs.

Funds Required:

1976

Capital

\$63,720

Estimated
Completion Date:

120 Days After Approval

Reason:

Reduction in Cost

Schedule III:

Not Included.
Reduce Normal Operating Budget

Return on
Investment:

Return on Annual
Commitment

Annual Savings After
Interest and Taxes

30.4

\$19,357

J.R.Thomas
ja



February 20, 1976

T.E. Tischer

M E M O R A N D U M

Dayton MOR #158-0389
Tire Shredder Machine
File #158-400

Purpose: Provide funds to purchase and install a Model 52-32H/100 HP Saturn Shredder, which will reduce tires and wood pallets in regard to volume occupied in disposal units. This will effect a net reduction in the monthly dumping trips, resulting in a daily savings.

Cost: \$63,720.00

Daily Savings: \$159.10

Annual Per Cent Return: 30.4%

- Remarks:
1. Approval of this MOR is recommended by this department.
 2. The Saturn Shredder is regarded as being quite a durable unit. It is heavy duty constructed and utilizes hydraulics as a means of shredding. Saturn Manufacturing Incorporated reports that maintenance on these units are minimal. The teeth of the grinding blades are about the only periodic replacement item necessary. Based on our usage rate, we would anticipate that the teeth would not have to be replaced before 2 years. In certain instances, the teeth can be resharpened. A set of new teeth would cost from \$3000-4000. \$5 per day has been included in the savings analysis as a cost item to cover teeth replacement.


Industrial Engineering

TET/pf


2/23